
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Write the full name of each plaintiff.

_____CV_____
(Include case number if one has been
assigned)

-against-

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

NICKOLAOS RENTOULIS, INDIVIDUALLY

~~ANDRONIKI RENTOULIS, INDIVIDUALLY~~

IRINI'S ORIGINALS, LLC

SM 1 MMS, L.L.C., DBA MANHATTAN MINI STORAGE, LLC, BURNAM SMARTCO, LLC

~~CRIS BURNAM AS CEO OF BURNAM SMARTCO, LLC & INDIVIDUALLY,~~

MIKE BURNAM AS PRESIDENT & CIO OF BURNAM SMARTCO, LLC & INDIVIDUALLY

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ **Federal Question**
- ☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<div style="text-align: right; font-weight: bold; font-size: small;">DEFENDANTS: SM 1 MMS, L.L.C., DBA MANHATTAN MINI STORAGE, LLC, SMARTCO, LLC</div> <hr/> <div style="display: flex; justify-content: space-between;"> First Name Last Name </div> <hr/> <div>Current Job Title (or other identifying information)</div> <hr/> <div>Current Work Address (or other address where defendant may be served)</div> <hr/> <div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>
Defendant 2:	<div style="text-align: right; font-weight: bold; font-size: small;">DEFENDANTS SM 1 MMS, L.L.C., DBA MANHATTAN MINI STORAGE, LLC, SMARTCO, LLC</div> <hr/> <div style="display: flex; justify-content: space-between;"> First Name Last Name </div> <hr/> <div>Current Job Title (or other identifying information)</div> <hr/> <div>Current Work Address (or other address where defendant may be served)</div> <hr/> <div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>
Defendant 3:	<hr/> <div style="display: flex; justify-content: space-between;"> First Name Last Name </div> <hr/> <div>Current Job Title (or other identifying information)</div> <hr/> <div>Current Work Address (or other address where defendant may be served)</div> <hr/> <div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>

Text

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dated



Plaintiff's Signature

First Name

Middle Initial

Last Name

Street Address

County, City

State

Zip Code

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

PARTIES

Plaintiffs

**I am a resident in New York, County of New York, State of New York.
I am Artist, Interior Designer And Creative Stylist In Fashion Accessorries.
I am a Founder and Sole Member of The Seren Fashion Art & Interior, LLC
My Company is a Domestic Limited Liability Company (LLC) existing by virtue of the laws of the State of New York with the principal place of business in the State of New York.
Website: www.thesereen.com**

Defendants

**SM 1 MMS, L.L.C., DBA MANHATTAN MINI STORAGE, LLC, SMARTCO, LLC
CRIS BURNAM, CEO OF BURNAM SMARTCO, LLC & INDIVIDUALLY,
MIKE BURNAM, PRESIDENT & CIO OF BURNAM SMARTCO, LLC & INDIVIDUALLY**

StorageMart is a trade name used to signify a group of affiliated entities based in Columbia, Missouri that collectively own and operate various StorageMart branded facilities in the United States, Canada, and the United Kingdom. Each StorageMart branded facility is owned and operated by one of these affiliated companies.

Burnam SMARTCOLLC owns the StorageMart logo and has licensed its use by each StorageMart affiliate that owns and operates each StorageMart branded location. Manhattan Mini Storage is a trademark used to signify a group of affiliated entities Columbia, Missouri that collectively own and operate various Manhattan Mini Storage LLC. branded facilities in New York. Each Manhattan Mini Storage branded facility is owned and operated by one of these affiliated companies.

SMI MMS,LLC owns the Manhattan Mini Storage logo and has licensed its use by each StorageMart affiliate that owns and operates each Manhattan Mini Storage branded location. There is no entity within the StorageMart or Manhattan Mini Storage group of companies that does business as Manhattan Mini Storage, LLC. SMI MMS,L.L.C, d/b/a Manhattan Mini Storage is the sole entity that owns, operates and manages the facility located at 420 East 62nd Street, New York, NY10065, which includes its self storage business.

**DEFENDANT: NICKOLAOS RENTOULIS, INDIVIDUALLY
DEFENDANT: ANDRONIKI RENTOULIS, INDIVIDUALLY
DEFENDANT: IRINI'S ORIGINALS, LLC**

**Nickolas Rentoulis and Niki Daskalopoulos, Individually are both are residents of Wilmington, Delaware.
They both are Principal Owners of their company called the Irini's Originals, LLC.
Irinis Originals, LLC is a Limited Liability Company, LLC
Business Started in 8/1/1982 and Incorporated in 12/12/2006
Located at 400 Philadelphia Pike, Wilmington, DE 19809.
Phone: 302-213-9208 / Phone: 302-762-0397
Email: info@irinisoriginals.com**

I brought this action to against all named Defendants, in the above caption to recover damages, I have incurred arising out of illegal auction and loss of my personal property stored in two units valued at \$439,854.97. Cause of action on All 18 Claims for Federal & State Violations for money judgment plus all legal case filing fees, costs and expenses, and pre-judgment interest against all named Defendants in this action.

1. §182 Lien Law Self-Storage Facilities Breach of Contract
2. §349 The New York General Business Law Deceptive Practices
3. §3901 SCRA The Service Members Civil Relief Act
4. §1868 The Fourteenth Amendment To the U.S. Constitution Civil Rights
5. §504, 505 Title 17, United States Code Intellectual Property, copyright infringement, theft of Trade secrets, designs, client's orders, inventory.From Unauthorized Access
6. §899-AA Notification Person Without Valid Authorization Acquired Private Information Identity Theft
7. §18 U.S.C. § 247 Damage to Property Prohibits Intentionally destroying Religious Items
8. NYCHRL New York City Human Rights Law & NYCHRL New York State Civil Rights Law
9. The Fair Housing Act of 1968
10. New York State of Temporary & Disability Assistance, OTDA Americans Disabilities Act, ADA
11. 18 NYCRR §§ 352.6(f) and 397.5(k) State Compilation of Codes, Rules And Regulations of the State of New York Title
18. Department of Social Services Chapter II. Regulations of The Department of Social Services SubChapter B. Public Assistance Article 5. Miscellaneous Part 397. Emergency Assistance For Adults
12. §5 U.S.C. § 552a(b). The Privacy Act's Disclosure & HIPAA Privacy Rule. 5 U.S.C. § 552a(b).
13. Unjust Enrichment and Replevin Action
14. Unlawful Detention of Goods is a legally actionable offense and violation of Bailement and Conversion law.
15. IED & NIED and Gross Negligence
16. Aiding, Abetting Professional Negeglience
17. Fraud in the inducement of Arbitration
18. New York Consolidated Laws, Penal Law - PEN § 155.05 Larceny; SECTION 155.05 Larceny; Defined Penal (PEN) CHAPTER 40, PART 3, TITLE J, ARTICLE 155 § 155.05 Larceny; New York Penal Law 165.40. This crime, Criminal Possession of Stolen Property in the Fifth Degree, is committed if and when you (1) knowingly possess stolen property and (2) either intend to impede the owner from retrieving that property or intend to benefit with the possession.

Belongings Valued At

1. Furniture = \$71,065
2. Bedroom Panels = \$6,600
3. Bathroom & Cleaning Products = \$950
4. Kitchen = \$5,830
5. Linen & Curtains = \$10,530
6. Closet Organizers = \$2,600
7. Electronics = \$1,300
8. Home Accessories = \$10,040
9. Mirrors = \$14,550
10. Lamps, Scones & Wall Hangings = \$20,500
11. Porcelain = \$18,940
12. Paintings = \$75,350
13. Framed Family Photos = \$6,580
14. Family Valuables = Priceless
15. Religious Items = Priceless
16. Dresses, Handbags & Luggage = \$113,769.97
17. Business Inventory = \$25,750 + \$55,500 = \$81,250
18. Total Value of Belongings = \$439,854.97